IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LEONA GUTHERMAN and CAROLINE : CIVIL ACTION

BRODIE, individually and on behalf of all : NO. 16-cv-02592-BMS

Plaintiffs,

v.

Defendants.

LUKOIL AMERICAS CORPORATION and LUKOIL NORTH AMERICA, LLC,

A, LLC,

LUKOIL NORTH AMERICA LLC'S RULE 7.1 DISCLOSURE STATEMENT

In accordance with Federal Rule of Civil Procedure 7.1, defendant LUKOIL North

America LLC states that it is (i) a wholly-owned subsidiary of LUKOIL Americas Corporation

and (ii) an indirect wholly-owned subsidiary of PJSC LUKOIL, a publicly traded Russian public

joint stock company that trades on the London Stock Exchange as well as stock exchanges in

Russia.¹

Respectfully submitted,

Dated: July 6, 2016 /s/ Katherine M. Katchen

(I.D. No. 80395)

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¹ In July 2015, to comply with Russian legal requirements regarding corporate names, the name of OAO LUKOIL (also known as Open Joint Stock Company or OJSC LUKOIL) was changed to Public Joint Stock Company LUKOIL (PJSC LUKOIL or PAO LUKOIL).

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served on July 6, 2016, by the Court's Electronic Case Filing system and by electronic mail on all counsel of record.

/s/ Katherine M. Katchen